

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE STATE OF NEW YORK *EX REL* VINOD  
KHURANA and THE CITY OF NEW YORK  
*EX REL* VINOD KHURANA,

Plaintiffs,

v.

SPHERION CORP. (N/K/A SFN GROUP,  
INC.),

Defendant.

Case No. 15-cv-06605-JFK

**RELATOR’S NOTICE OF MOTION FOR LEAVE TO FILE  
[SECOND PROPOSED] THIRD AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of David Kovel, each of which is filed concurrently herewith, and all prior proceedings in this action, Plaintiff-Relator Vinod Khurana (“Relator”), through his counsel, Kirby McInerney LLP, hereby respectfully moves this Court, at the Daniel Patrick Moynihan United States Courthouse, located at 500 Pearl Street, New York, NY 10007, Courtroom 20C, before the Hon. John F. Keenan, for leave to file the Second Proposed Third Amended Complaint pursuant to Fed. R. Civ. P. 15(a).

Dated: February 8, 2019

**KIRBY McINERNEY LLP**

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